

KRAMER LEVIN NAFTALIS & FRANKEL LLP

BARRY H. BERKE
PARTNER
PHONE 212-715-7560
FAX 212-715-7660
BBERKE@KRAMERLEVIN.COM

March 20, 2014

BY EMAIL AND ECF

The Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Michael Steinberg, S4 12 Cr. 121 (RJS)

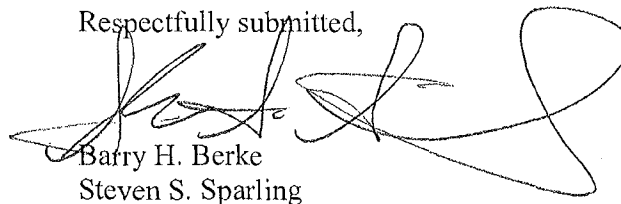
Dear Judge Sullivan:

We write to request a short adjournment of three weeks for the sentencing of Mr. Steinberg, which is currently scheduled for April 25, 2014. We have been working diligently gathering information and letters in support of Mr. Steinberg's sentencing submission, but for a variety of reasons the process is taking longer than we anticipated. In addition, while we have had discussions with the government on Guidelines issues, we expect there will be at least one significant area of disagreement that will require detailed briefing. We have not yet received the Presentence Report, and while Fed. R. Crim. P. 32(e)(2) only requires that it be served 35 days in advance of sentencing (which would be this coming Friday, March 21), we respectfully request a short additional period of time to complete our sentencing work on Mr. Steinberg's behalf.

We have conferred with the government and they consent this request. We also have consulted with your Chambers, which informs us that, subject to Your Honor's approval, May 16, 2014 at 11:15 a.m. is an available alternative sentencing date. That date also is acceptable to the government. Pursuant to Your Honor's Individual Rules of Practice for Sentencing Proceedings, our submission would be served two weeks in advance of the date of sentencing, or May 2, 2014 under the proposed schedule.

Thank you for your consideration.

Respectfully submitted,



Barry H. Berke
Steven S. Sparling

cc: AUSA Antonia M. Apps (by e-mail)
AUSA Harry Chernoff (by e-mail)